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Question 3 Comments (34 Responses)

Individual
Richard Salgo
NV Energy
The request is asking for clarity on the application of a requirement.
This request refers to the applicability of the stated requirement to "routine operating instructions".
The interpretation does not expand the reach of the standard.
Yes
Yes, this interpretation properly applies the subject requirement to the scope of "real time emergency situations".
Individual
Joe O'Brien
NIPSCO
The request is asking for clarity on the application of a requirement.
I believe this request is related to general applicability and not to an entity's particular facts or circumstances. Therefore this is a reasonable request.
The interpretation does not expand the reach of the standard.
I believe this clarifies a requirement.
No
Yes and No, I agree with the intent and appreciate this effort however the wording is not clear and concise. Please consider something like this and thanks: COM-002-2 R2 provides the requirements to be followed when a directive is issued only during a real-time emergency. Some of these directives can be routine operating instructions. This is consistent with the purpose statement which says in part "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition." As such, routine operating instructions during normal operations would not require the communication protocols for repeat backs as specified in R2. COM-002-2 R2 addresses verbal communication, and therefore electronic dispatch instructions would not fall under this requirement
Individual
David Thorne
Pepco
The request is asking for clarity on the meaning of a requirement.
Part of the Request for Interpretation is asking clarity on the meaning of

the requirement, whether "directives" are limited to emergency conditions or include routine/non-emergency conditions. The second part of the request is asking clarity on the application of the requirement, whether electronic instructions during emergency conditions require adherence to the same protocol.

The interpretation does not expand the reach of the standard.

Yes

The interpretation clarified that R2 verbal communication protocols apply to "directives" for emergency situations, not to normal/non-emergency situations. The interpretation also stated that R2 does not address the issuing of electronic directives during emergency conditions. That interpretation leaves this issue without resolution.

Group

SERC OC Standards Review Group

Gerald Beckerle

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

We believe that the interpretation team took a strict construction view of COM-002-2.

Yes

While we agree with the interpretation, we believe this standard needs to be revised to provide more clarity and certainty. Within the requirement (R2) there needs to be more clarity on how it supports the purpose of this standard, which in this specific case, addresses real-time emergency conditions only. Future versions of this standard would have more clarity by adding the word "verbal" in front of "directive" in requirement 2. The review team discussed the last sentence of the interpretation response regarding electronic communications as to whether or not it applied to this interpretation. We feel that it does not add to the response and suggest that the last sentence of the interpretation should be removed. "The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."

Individual

Dan Roethemeyer

Dynegy Inc.

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

Yes

Directives need to be clarified.

Group

PacifiCorp

Sandra Shaffer

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

Yes
Group
NPCC--comment form withdrawn
Lee Pedowicz
The request is asking for clarity on the meaning of a requirement.
Disregard selection.
The interpretation expands the reach of the standard.
Disregard selection.
No
Disregard selection.
Individual
Jeanie Doty
City of Austin dba Austin Energy
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Melissa Kurtz
US Army Corps of Engineers - Omaha District
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Doug Hohlbaugh
FirstEnergy
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Gregory Miller
BGE
No comment.
No comment.
No
BGE believes the interpretation does not adequately define when 3-part communications is required by COM-002-2. The interpretation states, "It only provides the requirements to be followed when a directive is issued during a real-time emergency." Does this refer only to operational instructions issued during a real-time emergency or does COM-002-2 also

cover any communications by operating personnel that take place during an emergency? BGE also believes that until "Directive" is defined that there will continuity to be ambiguity regarding when 3-part communications is required.
Individual
Andrew Pusztai
American Transmission Company
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Group
Santee Cooper
Terry L. Blackwell
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Chris Scanlon
Exelon
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Kathleen Goodman
ISO New England Inc.
The request is asking for clarity on the meaning of a requirement.
The interpretation expands the reach of the standard.
The draft interpretation appropriately clarifies that the requirement must fit within the context of the purpose statement. The original intent in the NERC Operating Policies, which was translated into Version 0, was that routine operating instructions do not require 3-part communication. The interpretation, however, implies that non-emergency communications may be audited as requiring 3-part communication, if the system operator issues a directive in a non-emergency situation. The sentence "routine operating instructions can be directives" therefore goes beyond the reach of the Standard.
ISO-NE generally supports the Interpretation as it clarifies: (a) that the meaning of the Standard is driven by its Purpose (i.e., as applying to emergency situations), and (b) that the 3-part communication requirements do not apply to non-verbal communication. Because the interpretation correctly states that the Standard does not define directives,

the sentence in the Interpretation that attempts to define directive as "routine operating instruction" should be struck to make the Interpretation more clear and concise, and not introduce new confusion and/or a new definition outside the Reliability Standards Development Process. For example, some auditors may interpret the Interpretation as meaning that other Standards which state that an entity must follow directives from its TOP as meaning that such situations require 3-part communications as well. We generally supports the Interpretation, subject to the revisions that we propose. In parallel, we continue to support the other drafting teams' efforts to address these issues in a more comprehensive fashion.

Individual

Greg Rowland

Duke Energy

The request is asking for clarity on the meaning of a requirement.

The interpretation expands the reach of the standard.

We believe that this interpretation expands the reach of the standard by attempting to define what can be a directive and by stating that the standard does not apply to all directives.

No

While we applaud the drafting team's attempt to respond to the request for clarification, we believe the current interpretation is unintentionally confusing and could be construed as expanding the reach of the standard. The proposed alternative language, based on the drafting team response, is offered to address these concerns: "COM-002-2 R2 does not define directive nor does it specify the conditions under which a directive is issued. It only provides the requirements to be followed when a directive is issued. The purpose statement for COM-002-2 is "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective." As such, routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2. This requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2."

Individual

Christine Hasha

Electric Reliability Council of Texas, Inc.

The request is asking for clarity on the meaning of a requirement.

The interpretation expands the reach of the standard.

ERCOT ISO believes the proposed Interpretation is an expansion of the requirement. The draft Interpretation appropriately clarifies that the requirement must fit within the context of the purpose statement. However, this is not what is drafted in the Interpretation. The Interpretation states that non-emergency communications such as routine operating instructions may be considered directives and, therefore, implies that they may be audited as directives. The draft Interpretation should align to the purpose statement of the Standard. The purpose of the Standard is to address real-time emergency conditions. Routine operating instructions are not intended to address real-time emergency conditions.

No

The draft interpretation not only fails to add clarity, but introduces further

confusion. ERCOT ISO offers the following suggestion for alternative language. The purpose statement for COM-002-2 is "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective." As such, COM-002-2 should only be interpreted to address the requirements to be followed for directives addressing a real-time emergency condition. It is understood that an entity may issue directives as part of routine operating instructions during normal operations. As such, routine operating instructions during normal operations do not require the communications protocols for repeat backs as specified in R2. This requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2.

Individual

Jonathan Appelbaum

United Illuminating Company

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

Yes

Group

Electric Market Policy

Mike Garton

The request is asking for clarity on the application of a requirement.

The interpretation does not expand the reach of the standard.

Yes

Group

MRO's NERC Standards Review Subcommittee

Carol Gerou

The request is asking for clarity on the application of a requirement.

The interpretation does not expand the reach of the standard.

No

The NSRS believes that the sentence "Routine operating instructions can be directives," should be struck. There is nothing in the standard that supports this statement. They included the statement because the question was asked. They should have answered the question that the standard does not address it. We also recommend changing "during a real-time emergency" to "to prevent or resolve a real-time emergency".

Individual

Brenda Powell

Constellation Energy Commodities Group

The request is asking for clarity on the meaning of a requirement.

The interpretation expands the reach of the standard.
The interpretation states that "routine operating instructions can be directives." The term "directives" is not in the NERC Glossary of Terms, nor is it locally defined in the standard. By stating what a directive might be, instead of what it definitely is, the interpretation expands the reach of the standard, without adding clarity.
No
In February 2010, the Project 2006-06 team submitted a draft version of COM-002 to industry. In this draft, the drafting team added more clarity to the standard by clearly defining what a directive is, as well as clearly defining the roles of the applicable functional models when giving or receiving directives. In light of the work already completed by that drafting team, we recommend that this interpretation be put on hold and if needed, the resources used for this interpretation be redirected to assist the Project 2006-06 standard drafting team and allow the team to complete their revision work, thus resolving the interpretive question.
Individual
Amir Hammad
Constellation Power Generation
The request is asking for clarity on the meaning of a requirement.
The interpretation expands the reach of the standard.
The interpretation states that "routine operating instructions can be directives." The term "directives" is not in the NERC Glossary of Terms, nor is it locally defined in the standard. By stating what a directive might be, instead of what it definitely is, the interpretation expands the reach of the standard, without adding clarity.
No
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Group
Lakeland Electric
Mace Hunter
The request is asking for clarity on the application of a requirement.
Lakeland Electric supports the drafting team's interpretation and agrees that "routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2".
The interpretation does not expand the reach of the standard.
Yes
Lakeland Electric supports the drafting team's interpretation and agrees that "routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2".

Group
Bonneville Power Administration
Denise Koehn
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Dan Rochester
Independent Electricity System Operator
This question is difficult to answer definitively. We believe that the request is to provide clarity on the meaning of the requirement, but perhaps more so, to provide clarity on the circumstances under which the requirement to use 3-part communication would apply (i.e the "When").
The interpretation does not expand the reach of the standard.
The response to the request for interpretation narrows the reach of the standard.
No
We believe that NERC Standard COM-002-2 has two separate and distinct purpose statements; the first is to ensure that entities have adequate communication facilities that are staffed and available for addressing real-time emergency conditions; the second is to ensure that communications by operating personnel are effective. The standard does not say that effective communications are required only during emergency conditions. Therefore we do not agree that the standard "... only provides the requirements to be followed when a directive is issued during a real-time emergency."
Group
Kansas City Power & Light
Michael Gammon
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Thad Ness
American Electric Power
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Saurabh Saksena
National Grid

The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
National Grid believes that the interpretation narrows the scope of the standard by clarifying that three-part communication is only related to real-time emergency conditions.
No
The interpretation is in line with National Grid's interpretation of COM-002 R.2. COM-002 R.2 only applies to directives used for real-time emergencies and not to directives used during normal operations. Also, National Grid believes that this interpretation should be consistent across all standards that use the term "directive" that is, COM-002 R.2's requirement for three-part communication applies only during real-time emergency situations.
Individual
Edward Davis
Entergy Services
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
No
We suggest the drafting team define "real-time emergency conditions" as that term will be applied for compliance with this standard and Interpretation. There are two issues here: 1) what are the operational conditions of the system that would define "real-time emergency conditions, and 2) what verbal terminology is acceptable so that others will immediately understand a "directive" is being given under "real-time emergency conditions" and the "directive" is not a "routine operating instructions during normal operations" directive. Is each BA, TOP, and GOP free to define its own protocols for identification of "real-time emergency conditions" which would then invoke the requirement to comply with this standard?
Individual
Kenneth A. Goldsmith
Alliant Energy
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
No
Strike the sentence "Routine operating instructions can be directives". Nothing in the standard supports this statement and it contradicts the first sentence of the interpretation which makes clear that COM-002-2 does not specify the conditions under which a directive is issued. In the second sentenct replace the clause "during a real-time emergency" with "to prevent or resolve a real-time emergency".
Group
LG&E and KU Energy LLC
Brent Ingebrigtsen
The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.
No
The inclusion of the word "only" and the phrase "during a real-time emergency" in the second sentence in the Response creates ambiguity for operators. The sentence as written may contradict the third sentence "Routine operating instructions can be directives." Additional ambiguity is introduced in the second to last sentence "[a]s such, routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2." LG&E and KU suggest revising the Response as follows: COM-002-2 R2 does not specify the conditions under which a directive is issued, nor does it define directive. COM-002-2 R2 provides the requirements to be followed when a directive is issued. Routine operating instructions can be directives if stated as such during the communication. COM-002-2 applies to all directives. The purpose statement for COM-002-2 is "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective." As such, routine operating instructions during normal operations may not require the communications protocols for repeat backs as specified in R2. This requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2. Directives should be stated as such during the communication.
Individual
Joe Petaski
Manitoba Hydro
The request is asking for clarity on the meaning of a requirement.
The request is asking for both clarity on meaning and application.
The interpretation does not expand the reach of the standard.
Please see comments in Question 3.
No
-The main problem is that the definition of 'directive' has not been clearly established by NERC and this is leading to confusion in the COM-002 standard. A SAR should be initiated to develop a definition for 'directive' in order to reduce the lack of clarity in COM-002. An interpretation cannot impose a definition on a standard. Definitions can only be developed through the SUD process. -In terms of the interpretation, we disagree that "It (the standard) only provides the requirements to be followed when a directive is issued during a real-time emergency". The purpose of the COM-002 standard is to ensure that operator communications are effective at all times including emergencies. -We disagree that "Routine operations do not require communication protocols". As a result of NERC's 2009 Industry Advisory Alert on COM-002-2, we believe that the implied definition of directive includes both operational and reliability directives. In absence of an official definition of directive, Manitoba Hydro treats any BES status change as a directive and applies the communication protocol stated in R2. -We agree that "electronic communications would not fall under R2"
Group
IRC Standards Review Committee
Ben Li
The request is asking for clarity on the meaning of a requirement.

The interpretation expands the reach of the standard.
The draft interpretation appropriately clarifies that the requirement must fit within the context of the purpose statement. The original intent in the NERC Operating Policies, which was translated into Version 0, was that routine operating instructions do not require 3-part communication. The interpretation, however, implies that non-emergency communications may be audited as requiring 3-part communication, if the system operator issues a directive in a non-emergency situation. The sentence "routine operating instructions can be directives" therefore goes beyond the reach of the Standard.
No
The SRC generally supports the Interpretation as it clarifies: (a) that the meaning of the Standard is driven by its Purpose (i.e., as applying to emergency situations), and (b) that the 3-part communication requirements do not apply to non-verbal communication. Because the interpretation correctly states that the Standard does not define directives, the sentence in the Interpretation that attempts to define directive as "routine operating instruction" should be struck to make the Interpretation more clear and concise, and not introduce new confusion. For example, some auditors may interpret the Interpretation as meaning that other Standards which state that an entity must follow directives from its TOP as meaning that such situations require 3-part communications as well. The SRC generally supports the interpretation, subject to the revisions that we propose. In parallel, we continue to support the other drafting teams' efforts to address these issues in a more comprehensive fashion.
Group
Midwest ISO Standards Collaborators
Jason Marshall
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
No
This interpretation has improved greatly over previous versions and we generally support it. However, we do believe a couple of refinements are necessary to finalize the interpretation. First, the sentence "Routine operating instructions can be directives" should be struck. Nothing in the standard supports this statement and it contradicts the first sentence of the interpretation which makes clear that COM-002-2 does not specify the conditions under which a directive is issued. We understand that statement was in response to the question asked in the request for interpretation. Given that the interpretation must be responsive to the question, we suggest that the response should simply state that the standard does not address routine operating instructions. We also recommend replacing the clause "during a real-time emergency" with "to prevent or resolve a real-time emergency" in the second sentence.